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Claims 1-17 are pending in the application. Claims 3 and 14 have been withdrawn from consideration. Applicants amend claims 1, 6, 10, 13, and 15-17 for clarification, and refer to Fig. 5 and its corresponding description in the specification for an exemplary embodiment of and support for the claimed invention. No new matter has been added.

Applicant respectfully requests that the Examiner acknowledge the priority claim and receipt of all certified copies of the priority documents for this application. Applicant also requests that the Examiner indicate acceptance of the drawings.

Claims 1-2, 6-13, and 15-17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2002/0129165 to Dingsor et al.; and claims 1-2, 4-13, and 15-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Dingsor et al. Applicant amends claims 1, 6, 10, 13, and 15-17 in a good faith effort to clarify the invention as distinguished from the cited references, and respectfully traverses the rejections.

The Examiner maintained these rejections because Dingsor et al. describe, in paragraph [0032] thereof, IP Source Address as being a field that "may be modified by a translation operation" that is performed either by NAT machine 100 or by server 200 on instructions from NAT machine 100. The Examiner argued that Dingsor et al., therefore, "implicitly" discloses or suggests NAT machine 100 altering the IP destination address of a client packet with instructions to server 200 to alter the source IP address of its response packet to the original IP destination address of the client packet. Even assuming, arguendo, that the interpretation of the implicit disclosure of Dingsor et al. is proper, the cited portions of Dingsor et al. still only include description of a NAT machine 100 handling inbound traffic and assigning server 200, and,

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therefore, still fail to disclose or suggest the claimed feature of a destination address modification device modifying a destination address of data and a communications device that receives the data modifying the source address of a response to an address of a communication device that is an original destination.

The Examiner also cited U.S. Patent No. 6,370,584 to Bestavros et al. and U.S. Patent No. 6,438,592 to Killian as references that allegedly suggest the claimed feature of modifying the source address of a response.

The cited portions of Bestavros et al. only include description of host devices belonging to the same LAN network forwarding communications with client devices to one another for load balancing. The LAN network described in Bestavros et al., therefore, does not disclose or suggest the claimed features of a destination address modification device modifying a destination address of data and a communications device that receives the data modifying the source address of a response to an address of a communication device that is an original destination.

And the cited portions of Killian only include description of a backend server transmitting a response message with the address of the spreader computer as the source address. Similar to the cited NAT machine 100 described in Dingsor et al., the spreader computer described in Killian merely handles incoming requests and performs "IP spreading and performance monitoring." Col. 8, lines 7-8 of Killian.

Thus, the cited references all merely describe a destination modification device that modifies the destination address of incoming data, and the source address of response data being modified to that of the same destination modification device.

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In other words, Dingsor et al., Bestavros et al., and Killian, as cited and relied upon by the Examiner, do not disclose or suggest,

“[a] communications device connected to a network with a client communications device and a destination address modification device modifying a destination address of data transmitted from the client communications device to an address of another communications device, comprising:

a receiving unit receiving communications data with a destination address modified by the destination address modification device;

a source address modification unit modifying a source address of response data in response to the communications data with the destination address modified by the destination address modification device, to an address of a communication device that is an original destination; and

a transmitting unit transmitting the response data with the source address modified by the source address modification unit to the address of the communication device that is the original destination, directly to the client communications device without passing the response data through the destination address modification device,” as recited in claim 1. (Emphasis added)

Accordingly, Applicant respectfully submits that claim 1, together with claims 2 and 4-5 dependent therefrom, is patentable over Dingsor et al., Bestavros et al., and Killian for at least the foregoing reasons. Claims 6, 10, 13, and 15-17 incorporate features that correspond to those of claim 1 cited above, and are, therefore, together with claims 7-9 and 11-12 dependent therefrom, respectively, patentable over Dingsor et al., Bestavros et al., and Killian for at least the same reasons.

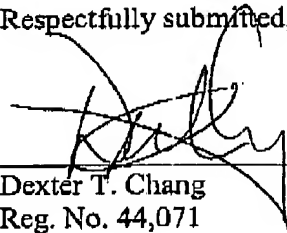
In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

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Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,


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